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REMARKS

Examiner S. Foong is thanked for the thorough examination and search of the subject Patent Application.

The Examiner is thanked for approving the drawing changes. Formal drawings will be sent once a Notice of Allowance is received.

All Claims are believed to be in condition for Allowance and that is so requested.

Reconsideration of the rejection under 35 U.S.C. 103 of Claims 1, 2, and 8 as being unpatentable over Babcock et al in combination with Kunikiyo and Matsumoto et al is requested in accordance with the following remarks.

It is agreed that Babcock et al shows a similar SOI device including shallow trench 275 and deep trench 270. It is agreed that Kunikiyo teaches forming contacts through an insulating layer and that this teaching could be combined with Babcock et al to enable formation of Babcock's contact 510 through an insulating layer.

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It is important to Applicants' invention that the second contact 39 contacts both the shallow trench 23 and the deep trench 29. See pages 9 and 11 of the Specification. This key feature is not taught in Babcock et al. It is agreed that Matsumoto et al discloses in Fig. 22 a shallow trench 104. Matsumoto teaches that the wiring 1010 could extend over a surface of the shallow trench 104 to improve element density. While this teaching could be combined with Babcock et al to allow the contact 510 to extend over the shallow trench 275, there is no teaching or suggestion in either of the references or in their combination that the contact 510 also extend over the deep trench 270.

Reconsideration of the rejection under 35 U.S.C. 103 of Claims 1, 2, and 8 as being unpatentable over Babcock et al in combination with Kunikiyo and Matsumoto et al is requested in accordance with the remarks above.

Reconsideration of the rejection under 35 U.S.C. 103 of Claims 3 and 9 as being unpatentable over Babcock et al in combination with Kunikiyo and Matsumoto et al and further in view of Chen et al is requested in accordance with the following remarks.

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It is agreed that Chen et al teaches methods of filling trenches and that these methods, including forming a liner layer could be used in Babcock et al. However, the key teaching of Applicants' invention that the second contact contacts both the shallow trench and the deep trench is not taught or suggested in any of the references.

Reconsideration of the rejection under 35 U.S.C. 103 of Claims 3 and 9 as being unpatentable over Babcock et al in combination with Kunikiyo and Matsumoto et al and further in view of Chen et al is requested in accordance with the remarks above.

Reconsideration of the rejection under 35 U.S.C. 103 of Claims 4, 5, 10, and 11 as being unpatentable over Babcock et al in combination with Kunikiyo and Matsumoto et al and further in view of Wolf is requested in accordance with the following remarks.

It is agreed that Wolf teaches a method of forming interlevel dielectrics as well as disclosing conductive materials. However, the key teaching of Applicants' invention that the second contact contacts both the shallow trench and the deep trench is not taught or suggested in any of the references.

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Reconsideration of the rejection under 35 U.S.C. 103 of Claims 4, 5, 10, and 11 as being unpatentable over Babcock et al in combination with Kunikiyo and Matsumoto et al and further in view of Wolf is requested in accordance with the remarks above.

Allowance of all Claims is requested.

It is requested that should Examiner Foong not find that the Claims are now Allowable that he call the undersigned at 765 4530866 to overcome any problems preventing allowance.

Respectfully submitted,

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